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16 UNITED STATES BANKRUPTCY COURT

17 DISTRICT OF OREGON

18 In re
19 Van's Aircraft, Inc.,
20 Debtor.

21 Case No. 23-62260-dwh11

22 **STIPULATED MOTION FOR ENTRY
23 OF STIPULATED ORDER
24 EXTENDING DEADLINE TO OBJECT
25 TO CLAIM NO. 354 (SCOTT
SCHIEBLE)**

26 Van's Aircraft, Inc. ("Van's") and Scott Schieble move this Court for entry of a
stipulated order extending the deadline for Van's to object to Claim No. 354 of Scott Schieble
("Claim 354") to August 30, 2024, as set forth below, and state as follows:

27 1. The Court entered its Order Confirming Debtor's Plan of Reorganization Pursuant
28 to 11 U.S.C. § 1191(b) [ECF No. 143] on May 16, 2024 (the "Plan"). The Plan became effective
29 on June 1, 2024 (the "Effective Date").

30 2. The parties been working diligently to resolve Claim 354. Van's expects that the
31 conferral process will be completed shortly, and that Claim 354 may be resolved, mostly likely
32 without need for the Court's claim objection process.

33 **Page 1 of 2 – STIPULATED MOTION FOR ENTRY OF STIPULATED ORDER EXTENDING
34 DEADLINE TO OBJECT TO CLAIM NO. 354 (SCOTT SCHIEBLE)**

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1 3. Van's certifies that, for the reasons set forth herein, the requested extension is in
2 good faith, Van's appropriately used the prior time, and that the continuance is being requested
3 at the earliest time practical. Van's and Mr. Schieble have agreed to stipulate to an extension of
4 the claim objection deadline, as it pertains to Claim 354, to August 30, 2024.

5 4. Attached hereto as **Exhibit 1** is a proposed Stipulated Order Extending Deadline
6 to Object to Claim No. 354 (Scott Schieble).

7 5. WHEREFORE, the parties pray this Court enter the Stipulated Order Extending
8 Deadline to Object to Claim No. 354 (Scott Schieble).

9 DATED: August 13, 2024.

10 TONKON TORP LLP

11 By /s/ Timothy J. Conway

12 Timothy J. Conway, OSB No. 851752
13 Michael W. Fletcher, OSB No. 010448
14 Ava Schoen, OSB No. 044072
15 Attorneys for Debtor

16 IT IS SO STIPULATED:

17 TONKON TORP LLP

18 By /s/ Timothy J. Conway

19 Timothy J. Conway, OSB No. 851752
20 Michael W. Fletcher, OSB No. 010448
21 Ava Schoen, OSB No. 044072
22 Attorneys for Debtor

23 By /s/ Scott Schieble

24 Scott Schieble
25 Claimant

EXHIBIT 1

Proposed Form of Stipulated Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Van's Aircraft, Inc.,

Debtor.

Case No. 23-62260-dwh11

**STIPULATED ORDER EXTENDING
DEADLINE TO OBJECT TO CLAIM
NO. 354 (SCOTT SCHIEBLE)**

THIS MATTER having come before the Court upon the Stipulated Motion for Entry of Stipulated Order Extending Deadline to Object to Claim No. 354 (Scott Schieble) [ECF No. __] (the "Motion"), and the Court having reviewed the Motion and otherwise being duly advised in the premises; NOW, THEREFORE,

IT IS HEREBY ORDERED that the deadline for Van's Aircraft, Inc. to object to Claim No. 354 of Scott Schieble is extended to August 30, 2024.

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(SCOTT SCHIEBLE)**

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I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

By _____

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IT IS SO STIPULATED:

TONKON TORP LLP

By _____

Timothy J. Conway, OSB No. 851752
Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
Attorneys for Debtor

By _____

Scott Schieble
Claimant